

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:
Pierre L. Craig
Karen C. Craig

Case No.: 16-25556

Chapter: 13

Hearing Date:

Judge: ABA

OBJECTION TO CERTIFICATION OF DEFAULT

Debtors, Karen C. Craig and Pierre L Craig, by way of Objection to the Certification of Default filed by the Trustee on or about August 12, 2019 state the following:

1. On or about August 12, 2016, Debtors filed a Chapter 13 bankruptcy in the United States Bankruptcy Court.
2. A Plan was confirmed on or about November 14, 2016 wherein the Debtors were to pay \$1507.00 a month through way of Wage Order.
3. A Wage Order was placed against the Debtor, Pierre L. Craig's employer, Board of Education, Camden City, New Jersey.
4. Prior to the Wage Order, the Debtors were current with payments.

5. The problem arose in that Mr. Craig is a school teacher and is only paid 10 of the 12 months. Accordingly, the wages are not being withheld in July and August, thereby causing the Trustee to not receive payments from the Debtors.
6. The Debtors have made several payments on their own during these months over the past three years, however, the plan is now about 5 months behind.
7. Debtor, Pierre L Craig is currently not working as it is during the summer break for the school that he teaches at.
8. Debtor is respectfully requesting that the Default/Dismissal be denied and allow the Debtors additional time to file an Amended Plan to place the post-petition arrearages into the remaining plan and correct the plan to show payments January through June and then September through December each year.
9. The filing of an Amended Plan or resolving the outstanding balance should not prejudice any parties involved in the instant matter.

Dated: August 23, 2019

/s/ Mark S. Cherry, Esquire
Attorney for Debtors